

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
DOMINICK TALARICO and	:	CHAPTER 13
MAUREEN TALARICO	:	
Debtors	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	CASE NO. 5:17-bk-02412
	:	
vs.	:	
	:	
DOMINICK TALARICO and	:	
MAUREEN TALARICO	:	
Respondents	:	

DEBTORS' REPLY TO TRUSTEE'S
OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

NOW COME DEBTORS, Dominick Talarico and Maureen Talarico, through their Attorney Raymond W. Ferrario and reply to the Objection to the Confirmation of the Debtor's Fifth Amended Chapter 13 Plan, as follows:

1. DENIED. To the contrary, the plan is feasible and is properly funded for the correct amount, namely \$111,969.47, which includes the Trustee's fees at current rate of 6.5%.

WHEREFORE, Debtors request that the Court deny Trustee's Objection to this Chapter 13 Plan.



Raymond W. Ferrario, Esquire
Attorney for Debtors
Dominick and Maureen Talarico
Attorney ID #: 35096
Suite 528 Scranton Life Building
538 Spruce Street
Scranton, PA 18503-1816
TEL: (570) 963-7878
FAX: (570) 963-7850
E-mail: ferrariobk@comcast.net

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

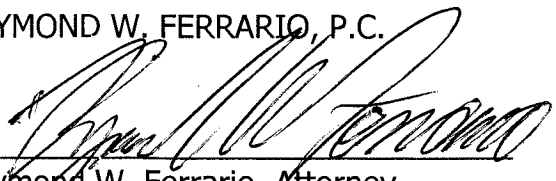
IN RE:	:	
DOMINICK TALARICO and	:	CHAPTER 13
MAUREEN TALARICO	:	
Debtors	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	CASE NO. 5:17-bk-02412
	:	
vs.	:	
	:	
DOMINICK TALARICO and	:	
MAUREEN TALARICO	:	
Respondents	:	

CERTIFICATE OF SERVICE OF DEBTORS' REPLY TO
TRUSTEE'S OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

I, Raymond W. Ferrario, hereby certify that I served a copy of the Certificate of Service to Debtors' Reply to Trustee's Objection to Fifth Amended Chapter 13 Plan on December 14, 2017, by e-mail, as follows:

Charles J. DeHart, III, Chapter 13 Trustee
Agatha R. McHale
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Via e-mail: dehartstaff@pamd13trustee.com
Via e-mail: amchale@pamd13trustee.com

RAYMOND W. FERRARIO, P.C.

By: 
Raymond W. Ferrario, Attorney
Dominick and Maureen Talarico
Suite 528, Scranton Life Building
538 Spruce Street
Scranton, PA 18503-1816
TEL. (570) 963-7878
FAX (570) 963-7850
E-mail: ferrariobk@comcast.net